

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

CONFIRM

Docket No. MC2002-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS BAKSHI TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE
(OCA/USPS-T1-21-31)

The United States Postal Service hereby provides the responses of witness Bakshi to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T1-21-31, filed on May 28, 2001.

As requested by the OCA, interrogatory OCA/USPS-T1-29 was corrected to remove "non" from "prebarcoded". Except as noted, the remaining interrogatories are stated verbatim and are followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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June 11, 2002

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OCA/USPS-T1-21. Please refer to your testimony at page 5 where you state: "The Postal Service will be able to use the Confirm system to assess the length of time it takes to process and deliver the mail once the Postal Service has accepted the mailing." Has the Postal Service generated any reports that aggregate the processing times for participating mailers so as to produce system figures for the length of time for processing and delivery, as opposed to individual Confirm customer figures? If so, please provide them separately for (a) First-Class letters, (b) First-Class flats, (c) Standard letters, (d) Standard flats, (e) First-Class letters *and* flats, and (f) Standard letters *and* flats. If not, please generate the reports described in (a) - (f) for the most recent 4 quarters available.

RESPONSE:

The statement regarding "assess[ing] the length of time it takes to process and delivery the mail" needs to be understood as those terms are used for Confirm. They do not mean that Confirm measures the time it takes from the entry of mail to its delivery to the recipient. I understand that other postal data systems provide information that more closely bears on processing and delivery in that sense. The key word in the quotation is "assess" since the primary use of Confirm data is to evaluate respective mailings and provide clues regarding why identified problems have arisen.

As reflected in USPS-LR-3/MC2002-1, reports have been developed for Confirm in association with mailer requests. The reports' primary focus is upon what happens with a given mailer's mail. Moreover, since scan data are not retained longer than fifteen days, there is no way of providing retrospective data by quarters. Nor are they available across class shape.

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OCA/USPS-T1-22. Does the Postal Service have plans to generate regular reports that aggregate customer processing/delivery times? If so, please describe the types of reports that are planned.

RESPONSE:

See the response to OCA/USPS-T1-21.

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OCA/USPS-T1-23. Please list all current internal Postal Service management uses for planet-code tracking information[.]

RESPONSE:

Reports are described in USPS-LR-3/MC2002-1. As reflected in the response to OCA/USPS-T1-21, the primary purpose driving reports is to troubleshoot problems, for example by researching a customer's complaints. Of course, it is possible that as the utility and significance of the data become better known, other reports may be commissioned.

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OCA/USPS-T1-24. Based on planet-code tracking information for the most recent 4 quarters available, please estimate the percentage of First-Class pieces (letters and flats) that are delivered within the Postal Service's 1-3-day service window.

RESPONSE:

Confirm data for the time periods requested are not available. Moreover, even if they were they do not provide the data contemplated by the question. Confirm data are not representative of classes or shapes of mail. See also, the response to OCA/USPS-T1-21.

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OCA/USPS-T1-25. Based on planet-code tracking information for the most recent 4 quarters available, please estimate the percentage of Standard Mail pieces (letters and flats) that are delivered within the Postal Service's service window. Also, please define the Postal Service's service window for Standard Mail pieces.

RESPONSE:

The requested data are not available. I understand that service standards have been the subject of other proceedings before the Commission and are available in the materials involved in those dockets.

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OCA/USPS-T1-26. Is it generally correct that machinable First-Class letters are sorted on Bar Code Sorters whenever they are sorted as individual pieces of mail (and excepting the facilities listed in response to interrogatory OCA/USPS-T1-1)? Does this incidence approach 100 percent? Please give a ballpark estimate if precise figures are unavailable.

RESPONSE:

In general, virtually all machinable First-Class Mail letters have access to automation equipment, including Bar Code Sorters (BCS). I am informed that, as a consequence, witness Miller abandoned the use of coverage factors in the letter mail processing cost models in the last omnibus rate case (please see Docket No. R2001-1, USPS-T-22, page 11 at 11-21).

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OCA/USPS-T1-27. Please give a ballpark estimate of the percentage of sorts for [machinable,] prebarcoded First-Class flats (when they are sorted individually) that are effected on flat-sorting machines.

RESPONSE:

This response is based upon information provided to me by other postal officials. It is unclear what is meant by the term "percentage of sorts." If this question refers to coverage factors, aggregate estimates for both prebarcoded and non-barcoded First-Class Mail flats can be found in Docket No. R2001-1, USPS LR-J-61, at 24.

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OCA/USPS-T1-28. Please give a ballpark estimate of the percentage of sorts for [machinable,] non-prebarcoded First-Class flats (when they are sorted individually) that are effected on flat-sorting machines.

RESPONSE:

Please see the response to OCA/USPS-T1-27.

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OCA/USPS-T1-29. Please give a ballpark estimate of the percentage of sorts for [machinable,] [...]prebarcoded Standard Mail flats (when they are sorted individually) that are effected on flat-sorting machines.

RESPONSE:

This response is based upon information provided to me by other postal officials. It is unclear what is meant by the term "percentage of sorts." If this question refers to coverage factors, aggregate estimates for both prebarcoded and non-barcoded Standard Mail flats can be found in Docket No. R2001-1, USPS LR-J-61, page 86.

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OCA/USPS-T1-30. Please give a ballpark estimate of the percentage of sorts for [machinable,] non-prebarcoded Standard Mail flats (when they are sorted individually) that are effected on flat-sorting machines.

RESPONSE:

Please see the response to OCA/USPS-T1-29.

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OCA/USPS-T1-31. Please give a ballpark estimate of the percentage of sorts for [machinable] Standard Mail letters (when they are sorted as individual pieces of mail) that are effected on Bar Code Sorters.

RESPONSE:

This response is based upon information provided to me by other postal officials. It is unclear what is meant by the term "percentage of sorts." If this question refers to coverage factors, virtually all machinable Standard Mail letters have access to automation equipment, including Bar Code Sorters (BCS). Consequently, witness Miller abandoned the use of coverage factors in the letter mail processing cost models in the last omnibus rate case (please see Docket No. R2001-1, USPS-T-22, page 11 at 11-21).

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

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